

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC *et al.*¹

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

Re: Docket Nos. 930, 1023, 1093, 1110

**ENI US OPERATING CO. INC. AND
ENI PETROLEUM US LLC'S NOTICE OF WITHDRAWAL OF
(I) OBJECTION TO DEBTORS' SECOND MOTION FOR ENTRY OF
AN ORDER FURTHER EXTENDING EXCLUSIVE PERIODS PURSUANT
TO SECTION 1121(d) OF THE BANKRUPTCY CODE; AND (II) OBJECTION
TO EMERGENCY MOTION OF DEBTORS FOR ORDER (I) AUTHORIZING
ENTRY INTO BACKSTOP COMMITMENT LETTER, (II) APPROVING
OBLIGATIONS THEREUNDER, AND (III) GRANTING RELATED RELIEF**

Eni US Operating Co. Inc. and Eni Petroleum US LLC (together, "Eni") hereby file this withdrawal of (i) the *Objection of Eni Petroleum US LLC and Eni US Operating Co. Inc. to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code* [Docket No. 1093] filed on March 22, 2021 (the "Exclusivity Objection"); and (ii) the *Objection of Eni US Operating Co. Inc. and Eni Petroleum US LLC to Approval of Emergency Motion of Debtors for Order (I) Authorizing Entry into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief* [Docket No. 1110] filed on March 23, 2021 (the "Backstop Objection"). Eni's withdrawal

¹ The Debtors in these chapter 11 cases (these "Cases"), along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

of the Exclusivity Objection and Backstop Objection is limited to objections to approval of (i) the *Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code* [Docket No. 930]; and (ii) *Emergency Motion of Debtors for Order (I) Authorizing Entry into Backstop Commitment Letter, (II) Approving Obligations Thereunder, and (III) Granting Related Relief* [Docket. No. 1023], respectively, and Eni otherwise reserves all rights, remedies and objections under the Bankruptcy Code and/or applicable law.

BRACEWELL LLP

By: /s/ William A. (Trey) Wood III
William A. (Trey) Wood III
711 Louisiana Street, Suite 2300
Houston, Texas 77002
Telephone: (713) 223-2300
Facsimile: (800) 404-3970
Email: trey.wood@bracewell.com

Mark E. Dendinger (admitted *pro hac vice*)
CityPlace I, 34th Floor
185 Asylum Street
Hartford, Connecticut 06103
Telephone: (860) 947-9000
Facsimile: (800) 404-3970
Email: mark.dendinger@bracewell.com

Jason B. Hutt (admitted *pro hac vice*)
2001 M Street, NW
Suite 900
Washington, DC 20036
Telephone: (202) 828-5800
Facsimile: (800) 404-3970
Email: jason.hutt@bracewell.com

*Counsel to Eni US Operating Co. Inc. and
Eni Petroleum US LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that on April 7, 2021, a true and correct copy of this document was served by electronic means as listed on the Court's ECF noticing system.

/s/ William A. (Trey) Wood III

William A. (Trey) Wood III